

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

DOCKET NO. 13-0657

DIRECT TESTIMONY

OF

JOHN F. CASH

SUBMITTED ON BEHALF

OF

**JOHN CASH
MARY LEWIS
WAYNE MUIRHEAD
DEAN MUIRHEAD
DENNIS MUIRHEAD
LYNN LANDMEIER
BETTY LANDMEIER
ARLENE WATERMANN
(THE “MUIRHEAD GROUP”)**

JANUARY 27, 2015

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John F. Cash

Submitted on Behalf of the “Muirhead Group”

Which is composed of Four Property Owners on Plato Road

WAYNE MUIRHEAD, DEAN MUIRHEAD, DENNIS

MUIRHEAD, JOHN CASH and MARY LEWIS, LYNN and BETTY LANDMEIER, ARLENE

WATERMANN

I. INTRODUCTION AND WITNESS QUALIFICATIONS

Q. Please state your name, your involvement in hearing, your business address and present position.

A. My name is John F. Cash, and I am the co-owner with my sister, Mary Lewis, of three parcels of land on Plato Road totaling 155 acres (“Cash/Lewis”). I am the spokesperson for the group of landowners along Plato Road referred to as the Muirhead Group. My business address is One Oak Brook Terrace, 22nd Street & Butterfield Rd., Oak Brook Terrace, IL 60181

Q. Please summarize your educational background and professional experience.

A. I attended the University of California, Santa Barbara receiving degrees in Business Economics and Political Science. I have worked in the corporate real estate field for nearly thirty years and I am a partner at Oakbrook Terrace based NAI Hiffman Commercial Real Estate for the past twenty two years.

Q. What are your duties and responsibilities in your present position?

A. As a real estate company owner, manager, and real estate advisor, I facilitate real estate transactions by analyzing specific real estate requirements and determine solutions. Whether purchasing, selling, leasing or building to suit, it is my role to evaluate the desired real estate requirement, location, feasibility, timing and economics of a project. I have serviced the real estate needs of many national and international companies including Home Depot, Motorola, HD Supply, True Value, Bridgestone, The Pampered Chef and others.

II. PURPOSE AND SCOPE

Q. Are you familiar with the Project known as the Grand Prairie Gateway “GPG” originally proposed by Commonwealth Edison Company (“ComEd”) in 2013?

A. Yes. ComEd filed with the Illinois Commerce Commission (“Commission”), a Verified Petition seeking a Certificate of Public Convenience and Necessity (“CPCN”) pursuant to Section 8-406.1 of the Public Utilities Act (“PUA” or “Act”), authorizing ComEd to install, operate, and maintain an overhead 345kV high-voltage electric transmission line and associated facilities, referred to as the Grand Prairie Gateway (“GPG”) Project (the “Project”). ComEd also sought an order authorizing or directing ComEd to construct the Project and related facilities pursuant to Section 8-503 of the Act.

Q. What do you understand is the obligation of ComEd?

A. I understand that the GPG Project was determined to be necessary in order to provide adequate, reliable, and efficient service to the public utility's customers and is required to utilize the least-cost means of satisfying the service needs of the public utility's customers. The GPG Project is to promote the development of an effectively competitive electricity market that operates efficiently, is equitable to all customers, and is the least cost means of satisfying those objectives.

46 **Q. What is the purpose of your testimony?**

47 **A.** My testimony specifically focuses on a 2.4 mile segment of the GPG transmission line
48 route between the Forest Preserve District Kane County (“FPDKC”) Muirhead Springs Forest
49 Preserve and Plato Center. The Muirhead Group advocates for a shorter, less expensive and less
50 disruptive route segment in this area. This alternate route was initially referred to as the “FPDKC
51 Adjustment” and later the “Burke Group Route” and most recently the “Muirhead Group
52 Rehearing Alternative.” The purpose of my testimony is to demonstrate that the Muirhead Group
53 Rehearing Alternative is significantly less expensive, more direct, requires less land, has fewer
54 towers, and a lower impact than the longer current “ICC Approved Route” or the “ComEd
55 Conditional Route.” It should be further noted that all three of these route alternatives impact the
56 Cash/Lewis property.

57 **Q. Who are the Muirhead Group and what is their involvement as**
58 **landowners/stakeholders?**

59 **A.** The Muirhead Group (also referred to as the Burke Group) is comprised of John Cash
60 and his sister Mary Lewis (3 parcels totaling 155 acres), Arlene Watermann (2 parcels totaling
61 117 acres) Lynn & Betty Landmeier (2 parcels totaling 38 acres) and Wayne, Dean & Dennis
62 Muirhead (1 parcel totaling 38 acres). The combined 348 acres is located on Plato Road
63 immediately south and east of the Muirhead Springs Forest Preserve. The Muirhead Group
64 properties are located within the City of Elgin Comprehensive Plan boundaries and are
65 designated by the Comprehensive Plan for future residential and commercial development. Due
66 to their location in the path of development, the properties, which are currently being farmed,
67 would most accurately be described as transitional land.

James A. Fitzgerald, Electrical Engineer at Fermi National Accelerator Laboratory, has also advised the Muirhead Group.

III. ROUTE ALTERNATIVES

_Q. Please describe the transmission line route initially proposed by ComEd.

A. The initial GPG route proposed by ComEd in the summer of 2013 showed the transmission lines running northwest from the Wayne Substation consistently along the CN railroad tracks, for 15 miles to Burlington Illinois. The ComEd “Open House II” exhibit dated 8/29/13 specifically shows the transmission line corridor following the CN railroad tracks through Plato Center utilizing approximately 1,800 LF of ComEd’s existing right-of-way. (See Exhibit G.)

_Q. When did this initial GPG route change near Muirhead Springs Forest Preserve and in what way?

A. In the fall of 2013, ComEd changed their initial route near Plato Road after gaining the impression that the FPDKC was reluctant to allow the transmission lines to follow the railroad tracks through Muirhead Springs. At that point, ComEd revised the route, significantly lengthening it, to run under and around the Muirhead Springs Forest Preserve. As a result, after following the CN railroad tracks for 10 miles, the transmission lines abruptly deviate from the CN tracks near Plato Road then cut straight west for 1.5 miles passing along the south border of Muirhead Springs, running through the Muirhead Group’s properties, then turns 90 degree north and runs for an additional 1 mile along the west border of Muirhead Springs finally returning to the CN railroad tracks.

In comparison to the initial route this diversion adds 3/4 miles of transmissions lines, 5 additional transmission towers, and negatively impacts 8 private properties totaling 736 acres. As

91 a result, the Muirhead Springs Forest Preserve is essentially caged on three sides in by
92 transmission towers. (See Exhibit B, F and H.)

93 **Q. Please describe the “Muirhead Group Rehearing Alternative”**

94 **A.** The FPDKC realized that the longer and less direct route traveling under and around
95 Muirhead Springs was a worse alternative than allowing ComEd to follow the railroad tracks
96 through Muirhead Springs. As a result, the FPDKC became an advocate for changing the route
97 back to its initial path along the railroad tracks. The name for this proposed segment adjustment
98 became commonly referred to as the “FPDKC Adjustment” and later the “Muirhead Group
99 Rehearing Alternative.”

100 Monica Meyers, the Executive Director of the FPDKC submitted a direct testimony on
101 April 2, 2014, June 20, 2014, and November 11, 2014 strongly advocating for the FPDKC
102 Adjustment/Muirhead Group Rehearing Alternative. Furthermore, The FPDKC is currently
103 working with ComEd to provide the appropriate rights and entitlements for the Muirhead Group
104 Rehearing Alternative to allow ComEd to pass through Muirhead Springs Forest Preserve along
105 the railroad tracks.

106 The Muirhead Group Rehearing Alternative utilizes 1,800 LF of exiting ComEd right-of-
107 way and is sufficiently wide to accommodate the current planned single set of structures
108 according to testimony from Steven T. Naumann P.E. of Exelon Company (Direct Testimony
109 ComEd Ex. 35.0 dated 12/30/14).

110 The shorter and straighter Muirhead Group Rehearing Alternative is estimated to save
111 \$3,100,000 per testimony from Steven T. Naumann P.E. of Exelon Company (Direct Testimony
112 ComEd Ex. 35.0 dated 12/30/14). This significant savings is understandable since the Muirhead

Group Rehearing Alternative is 2/3 miles shorter, requires 5 less towers and follows a straight path.

The Muirhead Group Rehearing Alternative also has the least negative impact on Environmental and Historical resources according to the 12/30/14 Direct Testimony, on behalf of ComEd, of Donell Murphy, Partner, Environmental Resources Management.

The Muirhead Group Rehearing Alternative is the least cost means of satisfying the objective with the least negative impact.

The Kane County Forest Preserve and the Muirhead Group recognize that the Muirhead Group Rehearing Alternative would provide much better aesthetics for Muirhead Springs. (See Exhibit C, G and H.)

.Q. Please describe the ComEd Conditional Alternative” Route.

A. ComEd is also presenting to the Commission a “ComEd Conditional Rehearing Alternative” route that passes through the Muirhead Springs Forest Preserve, but avoids Plato Center. Like the Muirhead Group Rehearing Alternative route, the ComEd Conditional Alternative route extends through the Muirhead Springs Forest Preserve parallel to the existing railroad tracks. After the line emerges from the eastern edge of the Muirhead Springs Forest Preserve the route continues for approximately ½ mile along the railroad tracks until proceeding south for a distance of about 1,500 feet until it intersects the approved route. Thus, the ComEd Conditional Alternative route follows the railroad right-of-way through the Muirhead Springs Forest Preserve, but avoids Plato Center. At approximately 10,300 LF this route would be longer than the Muirhead Group Rehearing Alternative but still 2,300 LF shorter than the ICC Approved Route and require 4 less towers. (See Exhibit A.)

IV. ROUTE ALTERNATIVES COMPARISON

Q. Please compare the cost and impact of the current ICC Approved Route to the Muirhead Group Rehearing Alternative and the ComEd Conditional Alternative.

A. Per ComEd's estimate prepared by Steven T. Naumann P.E. Exelon Company (per ComEd Ex. 35.0 dated 12/30/14) the Muirhead Group Rehearing Alternative following the railroad tracks through Plato Center is estimated to save \$3,100,000. The ComEd Conditional Rehearing Alternative Route is estimated to save \$1,400,000.

Q. Please compare ComEd's existing property rights and the number of landowners affected in the ICC Approved Route, Muirhead Group Rehearing Alternative and the ComEd Conditional Alternative.

A. In the Muirhead Group Rehearing Alternative ComEd would utilize 1,800 LF of ComEd right-of-way which is 20% of the total 9,100 LF required whereas the ICC Approved Route and the ComEd Conditional Rehearing Alternative Route utilizes none.

The ICC Approved Route is 12,600 LF in length with 17 towers. The ComEd Conditional Rehearing Alternative Route is 10,300 LF with 13 towers and the Muirhead Group Rehearing Alternative Route is 9,100 LF with 12 towers.

The current ICC Approved Route involves 8 private owners and 12 parcels totaling 736 acres while the Muirhead Group Rehearing Alternative involves 6 private owners totaling 89 acres. The ComEd Conditional Route involves 2 owners and 3 parcels totaling 232 acres. (See Exhibit D, E)

V. COMED'S METHODOLOGY

Q. Has ComEd been consistent in their methodology in regarding other proposed adjustments elsewhere along the Primary Route (now the ICC Approve Route)?

159 A. As our November 20th MOTION FOR REHEARING AND/OR CORRECT RECORD
160 REGARDNG FPDKC ADJUSTMENT details, over the course of establishing the ICC
161 Approved Route, ComEd argued against other proposed route adjustments elsewhere along what
162 was then referred to as the Primary Route on the basis that those proposed adjustments were (A)
163 longer, (B) not using existing ComEd Right-of-Way (C) not along the rail road tracks and (D)
164 more expensive. ComEd's logic in those instances actually serves to support the rational of
165 Muirhead Group Rehearing Alternative which efficiently utilizes ComEd right-of-way, follows
166 the railroad and is the shortest, most direct, least expensive route. Accordingly, ComEd's appears
167 to contradict itself in its reluctance in adopting the Muirhead Group Rehearing Alternative. (See
168 Exhibit I.)

169 V. **CONCLUSION**

170 Q. **Does this conclude your direct testimony on rehearing?**

171 A. Yes, it does.